UNITED STATES DISTREMISOUFFICE FOR THE DISTRICT OF MASSACHUSETTS

DIRECT REPORT CORPORATION d/b/a/ SHAREHOLDER.COM,

Plaintiff.

v.

CCBN.COM, INC., THE THOMSON CORPORATION, JOHN DOES 1 THROUGH 5, and JANE DOES 1 THROUGH 5,

Defendants.

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U.S. DISTRICT COURT DISTRICT OF MASS.

Civil Action No. 04-10535-PBS

DEFENDANTS CCBN.COM AND THE THOMSON CORPORATION'S ASSENTED-TO MOTION TO IMPOUND (1) THEIR OPPOSITION TO PLAINTIFF'S MOTION TO COMPEL INTERROGATORY ANSWERS; AND (2) THEIR RESPONSE TO WITNESS ROBERT ADLER'S MOTION FOR A PROTECTIVE ORDER

Defendants CCBN.com, Inc. ("CCBN") and The Thomson Corporation ("Thomson") submit this Assented-To Motion to Impound: (1) Defendants' Opposition to Plaintiff Direct Report Corporation d/b/a/ Shareholder.com's ("Shareholder") Motion to Compel Interrogatory Answers; and (2) Defendants' Response to Witness Robert Adler's Motion For a Protective Order.

Impoundment of each filing is necessary because defendants' Opposition and Response contain references to, and attach excerpts from, transcripts of depositions, portions of which have been designated as either "Confidential" and "Highly Confidential," as well as interrogatory responses that have been designated as "Confidential," which requires a motion for impoundment under the terms of the Stipulated Protective Order (attached as Exhibit A).

Plaintiff's Memorandum in Support of Its Motion to Compel Interrogatory Answers was itself impounded, and plaintiff has assented to the relief requested in this Motion.

Respectfully submitted,

CCBN.COM, INC. and THE THOMSON CORPORATION,

By its attorneys,

Anthony S. Fiotto (BBO #558089) David M. Moss (BBO #649707) GOODWIN PROCTER LLP

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DATED: January 25, 2004

LOCAL RULE 7.1A(2) CERTIFICATION

Pursuant to Local Rule 7.1(A)(2), counsel for defendants conferred with counsel for plaintiff in a good faith effort, and plaintiff's counsel assented to defendants' Assented-To Motion to Impound (1) Their Opposition to Plaintiff Direct Report Corporation d/b/a/ Shareholder.com's ("Shareholder") Motion to Compel Interrogatory Answers; and (2) Their Response to Witness Robert Adler's Motion For a Protective Order.

Dated: January 25, 2005

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon counsel for plaintiff by hand delivery on January 25, 2005.

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